

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
MICHAEL SEAN SPEIGHT,)	
)	
Plaintiff)	
)	
v.)	Case No. 1:24-cv-12363-PBS
)	
AMANDA KAELEBLEIN,)	
MICHAEL KAELEBLEIN,)	
NANCY KAELEBLEIN,)	
ERIC STEPHANIE,)	
)	
Defendants)	
_____)	

DEFENDANTS MICHAEL KAELEBLEIN AND NANCY KAELEBLEIN'S
MOTION TO DISMISS 1983 CIVIL RIGHTS COMPLAINT

Defendants Michael Kaelblein and Nancy Kaelblein, by and through their undersigned counsel and pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), respectfully moves the Court for an order dismissing all claims against. In support of this Motion, Defendants Michael Kaelblein and Nancy Kaelblein state as follows:

1. For the reasons set forth in their Memorandum of Law in Support of this Motion to Dismiss 1983 Civil Rights Complaint, which is filed contemporaneously herewith, Defendants Michael Kaelblein and Nancy Kaelblein seek an order dismissing all claims against them for lack of subject-matter jurisdiction and for failure to state a claim upon which relief can be granted.

2. Pursuant to Local Rule 7.1(a)(2), undersigned counsel contacted Plaintiff to attempt to resolve or narrow the issue, and Plaintiff stated that he objected to the relief requested herein.

WHEREFORE, Defendants Michael Kaelblein and Nancy Kaelblein respectfully request that this Court:

- A. Allow this Motion and dismiss Plaintiff's claims against them; and
- B. Grant such other and further relief as equity and justice require.

Respectfully submitted,
Michael Kaelblein and Nancy Kaelblein
By their Attorneys
Welts, White & Fontaine, P.C.

Date: 11/06/2024

By: /s/ Nicole Fontaine Dooley
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CERTIFICATE OF SERVICE

I, Nicole Fontaine Dooley, hereby certify that on November 06, 2024, this document was filed through the ECF system and sent electronically to the registered participants as identified on the notice of electronic filing (NEF) and by first class mail to non-registered participants.

/s/ Nicole Fontaine Dooley
Nicole Fontaine Dooley